

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF ARKANSAS
EL DORADO DIVISION**

**IN RE: LOWRY FARMS, INC.
 DEBTOR**

**CASE NO.: 1:24-bk-70535
 CHAPTER 7**

**MARCOS TORRES CASARRUBIAS RESPONSE TO MOTION FOR RULE 2004
EXAMINATION OF UNION BANK & TRUST COMPANY**

Comes now Marcos Torres Casarrubias, (hereinafter “Marcos”) by and through his attorneys, Hashem Law Firm, PLC, and for its Response, states as follows:

1. That the Antonio-Benito, et al. Creditors, seek to subpoena records from Union Bank & Trust Company, account records regarding Marcos.
2. That any such production of the private banking records of Marcos, should be subject to an appropriate Protective Order limiting the dissemination of said records to the Counsel for the Antonio-Benito, et al. Creditors and attorneys for the Debtor.
3. That any production of banking records regarding Marcos should also be required to be produced to Counsel for Marcos, Hani W. Hashem.

WHEREFORE, Marcos Torres Casarrubias, prays that the Motion for Rule 2004 Examination of Union Bank & Trust Company, be denied; that in the alternative, a Protective Order be entered regarding the dissemination of Marcos Torres Casarrubias, private banking records; and that a copy of said records produced pursuant to Subpoena be provided to Counsel for Marcos Torres Casarrubias; and for all other just and equitable relief to which he is entitled.

Respectfully submitted,

BY: /s/ HANI W. HASHEM
HANI W. HASHEM – 87076
The Hashem Law Firm, PLC
Post Office Box 739
Monticello, AR 71657
(870) 367-4223
Email: hwh@hashemlawfirm.com

CERTIFICATE OF SERVICE

I, Hani W. Hashem, attorney for Marcos Torres Casarrubias, do hereby certify that a true and correct copy of the above and foregoing Response to Motion for Rule 2004 Examination of Union Bank & Trust Company has been *emailed Via ECF Electronic Delivery* to the following, and all creditors and parties of interest, on this 22nd day of October, 2024:

James M. Knoepp
1612 Crestwood Drive
Columbia, SC 29205
Email: jknoepp@gmail.com

Scott D. McCoy
Southern Poverty Law Center
2 S Biscayne Blvd., Suite 3750
Miami, FL 33131
Email: scott.mccoy@splcenter.org

/s/ HANI W. HASHEM
HANI W. HASHEM